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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**TIANA TOZER, PHILIP RHODES,
BARBARA JACOBSEN, DANE
SOUTHARD, LORIEN ILENA
WELCHOFF, PAULINE LONG, MARK
BARNHILL, STEVE JACKSON, KEITH
MARTIN, and STEVEN REBISCHKE on
behalf of themselves and all others similarly
situated,**

Plaintiffs,

v.

CITY OF PORTLAND,

Defendant.

3:22-cv-01336-MO

**JOINT MOTION TO STAY DISCOVERY
AND PRETRIAL DEADLINES**

Defendant City of Portland ("City") and Plaintiffs Tianna Tozer, Philip Rhodes, Barbara Jacobsen, Dane Southard, Lorien Ilena Welchoff, Pauline Long, Mark Barnhill, Steve Jackson, Keith Martin, and Steven Rebischke (collectively, "Plaintiffs") move this Court to stay all Discovery and Pretrial Deadlines set forth in the Discovery and Pretrial Scheduling Order (ECF 2) until the parties submit their discovery plan pursuant to Fed. R. Civ. P. 26(f).

On October 31, 2022, this Court granted the City's Motion for Extension of Time to Answer Complaint. (ECF 11). As indicated in the Declaration of Naomi Sheffield filed in support of the City's Motion for Extension of Time to Answer Complaint, the parties have and continue to engage in discussions regarding resolution of this matter. (ECF 9). The parties intend to confer to develop a discovery plan pursuant to Fed. R. Civ. P. 26(f) within thirty days of the City filing its responsive pleading or motion, as contemplated by this Court's Discovery and Pretrial Scheduling Order. (ECF 2). The parties ask that the Court stay all Discovery and Pretrial Deadlines until the parties have completed their FRCP 26(f) conferral and submitted their discovery plan.

This motion is based upon the complete court file.

Dated: December 9, 2022

Respectfully submitted,

/s/ Naomi Sheffield

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